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10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA
12

13 DAVID KOOCHOU,

14 Plaintiff,

15 v.

16 KILOLO KIJAKAZI,
Acting Commissioner of Social Security,

17 Defendant.
18

No. 2:21-CV-00980-DMC

STIPULATED MOTION AND ORDER FOR
AN EXTENSION OF TIME TO RESPOND TO
PLAINTIFF'S MOTION FOR SUMMARY
JUDGMENT

19
20 IT IS HEREBY STIPULATED, by and between the parties through their respective
21 counsel of record, with the Court's approval, that Defendant's time for responding to Plaintiff's
22 Motion for Summary Judgment be extended thirty-five days (35) days from June 2, 2022, to July
23 7, 2022. This is Defendant's first request for an extension. Counsel for Plaintiff has no objection
24 to Defendant's request for an extension.

25 Good cause exists for this request. Defendant respectfully requests this additional time
26 because Counsel for Defendant will be unable to devote the time required to complete
27 Defendant's response to Plaintiff's Motion for Summary Judgment given the current due date. As
28

1 this Court no doubt knows, Social Security case filings in federal court increased significantly in
2 the past year. The increased filings, compounded by COVID-related delays in transcript
3 production and attorney attrition, have resulted in an increased workload and competing
4 deadlines. Counsel for Defendant currently has fourteen (14) merit briefs currently due in district
5 court cases over the next 30 days and a week of scheduled leave in June. Given this current
6 workload an extension until July 7, 2022 should provide an opportunity for the undersigned
7 Counsel for Defendant to complete the response to Plaintiff's Motion for Summary Judgment.
8 Furthermore, a reassignment of this matter to another staff attorney is currently not tenable given
9 the high volume of cases that all of our limited staff (due to leave and resignations) is handling.
10 Counsel apologizes to the Court for any inconvenience caused by this delay. All other dates in
11 the Court's Scheduling Order shall be extended accordingly.

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13 Respectfully submitted,

14 PHILLIP A. TALBERT
15 United States Attorney

16 DATE: June 1, 2022

17 By: s/ Oscar Gonzalez de Llano
18 OSCAR GONZALEZ DE LLANO
19 Special Assistant United States Attorney
20 Attorneys for Defendant

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22 Respectfully submitted,

23 Attorneys for Plaintiff

24 DATE: June 1, 2022

25 By: s/ Harvey Peter Sackett *
26 Harvey Peter Sackett
27 Sackett & Associates, A Professional Law Corporation
28 (*as authorized by email)

ORDER

Pursuant to Defendant's Motion, IT IS SO ORDERED that Defendant shall have an extension, up to and including July 7, 2022, to respond to Plaintiff's Motion for Summary Judgment.

Dated: June 3, 2022

A handwritten signature in dark ink, appearing to read 'Dennis M. Cota', is written over a horizontal line.

DENNIS M. COTA
UNITED STATES MAGISTRATE JUDGE